

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)

Ref. No. 22153

**NOTICE OF DEPOSITION OF W.R. GRACE & CO., ET AL.
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the claimants injured by exposure to asbestos from the Debtors' operations in Lincoln County, Montana (the "Libby Claimants"),¹ through their undersigned counsel, will take the deposition of **W.R. Grace & Co., et al.** (the "Debtors"). The deposition will commence on **July 23, 2009**, beginning at **9:30 a.m. (ET)**, at Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, DE 19801, or on such other date and at such other location as mutually agreed by the Libby Claimants and the Debtors. The deposition will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means. You are hereby invited to attend and examine the witness.

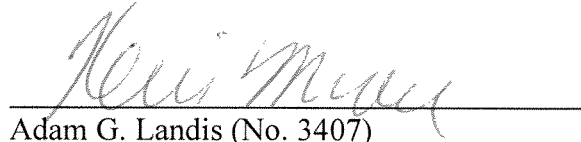
Pursuant to Rule 30(b)(6), the Debtors shall designate one or more officers, directors, managing agents, or other persons who consent to testify on their behalf as to all facts and other information known or reasonably available to the Debtors relating to the Debtors' Motion for an Order Approving Settlement Agreement and Mutual Release with the Royal Parties [Docket No.

¹ As identified in the Amended and Restated Verified Statement of Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP Pursuant to Fed. R. Bankr. P. 2019 [D.I. 21365], as it may be amended and restated from time to time.

22153] (the "Motion") and the proposed Settlement Agreement and Mutual Release (the "Proposed Settlement"), a copy of which was attached to the Motion as Exhibit A. For each person designated to testify as to these matters, the Debtors are requested to produce at the deposition all documents² which the person has reviewed in preparing to testify with respect to the matters as to which the person is designated to testify, and, unless already made available in discovery, all other documents relating to the Motion and Proposed Settlement.

Dated: July 15, 2009
Wilmington, Delaware

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Counsel for Libby Claimants

² "Document" or "documents" shall have the meaning set forth in Rule 34 of the Federal Rules of Civil Procedure.